

MEMO ENDORSED



OBERDIER
RESSMEYER
LLP

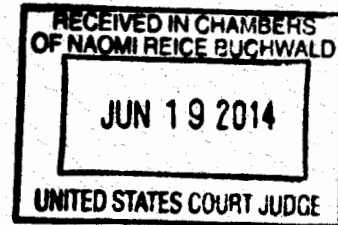
USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 06/20/2014

CARL W. OBERDIER
655 THIRD AVENUE
28TH FLOOR
NEW YORK, NY 10017
(212) 659-5141
(646) 349-4925 FAX
cwo@oberdier.com
www.oberdier.com

June 18, 2014

BY FACSIMILE ((212) 805-7927)

The Honorable Naomi Reice Buchwald
United States District Judge
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl St., Courtroom 21A
New York, NY 10007-1312



Krane Distribution LLC v. Harvest Global Investments, Ltd.
14-cv-3589 (NRB)(FM)

Dear Judge Buchwald:

We represent defendant Harvest Global Investments, Ltd. ("HGI") in the above-captioned action. We are writing, with the plaintiff's consent, to request the Court's approval of a month's extension of HGI's time to move, answer, or otherwise respond to the plaintiff's complaint. This is the first request for such an extension.

Plaintiff filed the complaint on May 19, 2014. Counsel for HGI voluntarily accepted service of the summons and complaint, effective as of May 30, 2014. Under FED. R. CIV. P. 12(a), HGI's deadline to respond to the complaint is June 20, 2014. We understand that the other defendant, Harvest Fund Management Co., Ltd., a Chinese company headquartered in Beijing, People's Republic of China, has not yet been served with the summons and complaint.

The requested extension of time is necessary to enable our firm, which was retained yesterday, to learn the facts of the case, research applicable law, and prepare HGI's written response to the complaint. We therefore respectfully request that the Court approve the parties' agreement to extend HGI's time to move, answer, or otherwise respond to the complaint until July 21, 2014.

Respectfully submitted,

Carl W. Oberdier

So ordered
Naomi Reice
Buchwald,
USDC
6/20/14

cc: Leon Medzhibovsky, Esq. (by electronic mail)
Airina L. Rodrigues, Esq. (by electronic mail)
Counsel for Plaintiff

MEMO ENDORSED